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LETTER REGARDING REGULATORY REVIEW AND COMMENTS OF RISK BASED
REMEDATION AT SOLID WASTE MANAGEMENT UNITS 64, 67, 68 AND AREA OF
CONCERN 7 NAS FORT WORTH TX

2/8/2000

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 509

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Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
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Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 8, 2000

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Don Ficklen
Restoration Team Chief
Air Force Center for Environmental Excellence (AFCEE)
3207 North Road
Brooks AFB, TX 78235-5363

Re: Comments to Risk-Based Remediation SWMU 68, 67, 64, and AOC 7 Report,
dated July 1997
Naval Air Station Fort Worth JRB/Carswell AFB (NAS Ft. Worth)
TNRCC Industrial Solid Waste Registration No. 65004
TNRCC Hazardous Waste Permit No. HW-50289
EPA ID No. TX0571924042

Dear Mr. Ficklen:

The Texas Natural Resource Conservation Commission (TNRCC) has reviewed the above referenced Report, submitted September 15, 1997. These units were included in the facility's hazardous waste permit, or by letter, as units required to undergo a RCRA Facility Investigation (RFI). At the time of assessing these units for an RFI, there was a documented release of BTEX to the groundwater from this unit. Therefore, this document was originally written in PST language and it was submitted to the TNRCC PST Division. The SWMU 68 portion of this document was reviewed and approved by the PST Division, LPST ID No.104819 was assigned, and a PST monitoring program was initiated. SWMU 68 (also designated ST14) is the POL Tank Farm and Fuel Loading Area. However, AOC 7 (the Former Base Refueling Area), SWMU 64 (the French Underdrain), and SWMU 67 (the Oil/Water Separator), together designated SD13, were referred to Industrial and Hazardous Waste for review, as these units could have possibly managed and released solid waste.

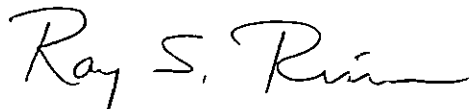
Based on our review of this document, the Corrective Action (CA) Section has determined that AOC 7 did not manage or release solid waste. Therefore, as a PST eligible site, the Report (concerning AOC 7) was referred to PST on January 20, 2000. SWMU 68 and AOC 7 are no longer required to complete the RFI/CA Program. The TNRCC no longer removes SWMUs from the CA portion of the permit; however, AFCEE may request that the permit reflect that SWMU 68 is being addressed by PST authority, no further permit required CA. The TNRCC directs AFCEE, upon the occurrence of the current/next permit modification, to add all the extra RFI units incorporated into the CA Program by TNRCC letters dated April 22, 1994 and March 2, 1995 (excluding AOC 7).

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The CA Section has also determined that SWMU 64 and 67 were originally constructed as remediation units for the BTEX release from SWMU 68 (and possibly AOC 7) and should have initially been assessed as PST sites. However, our review can not conclusively determine that these two units did not also manage or release solid wastes. Therefore, the permit required CA for these units shall be completed. In that regard, the TNRCC approves the Report as a RCRA Facility Investigation (RFI) Report for SWMUs 64 and 67. AFCEE should now proceed to the Corrective Measures Implementation (CMI) phase of the permit required CA and submit a CMI Workplan for closure of SWMU 64. It is noted however that SWMU 67 and the lower portion of SWMU 64 (which will be referred to as ancillary equipment) is currently being closed by removal to Risk Reduction Standard (RRS) 2 or 1 by the Base Realignment and Closure (BRAC) Program, as it is located on BRAC property. The TNRCC suggests that a closure plan be submitted with a similar closure approach for the remaining portion of SWMU 64 (which will be referred to as SWMU 64) on the Defense Environmental Restoration Account (DERA) property. It should be noted that at this point of the CA Program, the public should be notified of the RFI results and CMI plans. However, it is currently the policy of the TNRCC that if closure is to RRS 1 or 2, the public notice for RFI Units can be included with the next permit modification.

An original and two copies of the CMI Workplan for SWUM 64 must be submitted to the TNRCC at the letterhead address using mail code number MC-127. An additional copy should be submitted to Mr. Sam Barrett, Waste Program Manager, TNRCC, Region 4 Office, 1101 East Arkansas Lane, Arlington, TX 76010-6499, and to Mr. Gary Miller, EPA, Region 6, Dallas, Tx. The CMI Workplan must be received within 120 days from the date of this letter. Should you need additional information or wish to discuss these comments or the due date, please call me at (512) 239-2333. Thank you for your cooperation in this matter.

Sincerely,



Ray S. Risner, Sr. Project Manager
Team II, Corrective Action Section
Remediation Division
Texas Natural Resource Conservation Commission

RSR/rsr

cc: Mr. Rafael Vasquez, AFBCA/HQ - Bergstrom
Mr. Gary Miller, EPA Region 6, Dallas, TX (6PD-NB)
Mr. Sam Barrett, Waste Program Manager, TNRCC Region 4 Office, Arlington
Mr. Mark Weegar, BRAC Project Manager, CA Section (MC-127)

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